

FILED

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

2019 APR 18 PM 4:23

IN AND FOR THE COUNTY OF COCHISE

STATE OF ARIZONA,

Plaintiff,

vs.

SARA BAILEY f.k.a.
SARA COPELAND,
JUSTIN ALEXANDER COPELAND

Defendant.

GRAND JURY NO. 19- 2144 J HUNLEY
CLERK OF SUPERIOR COURT

CASE NO. CR2019-

CASE NO. CR2019- 00316

INDICTMENT

The Grand Jurors of the County of Cochise, in the name of the State of Arizona, and by its authority accuse:

JUSTIN ALEXANDER COPELAND

and charge that in Cochise County:

COUNT 1

From on or after April 5, 2019 through April 15, 2019, **JUSTIN ALEXANDER COPELAND** and SARA BAILEY (f.k.a. SARA COPELAND) conspired to commit influencing a witness by threatening or offering, conferring or agreeing to confer a benefit upon a witness in any official proceeding with the intent to influence the testimony of that person, to wit: agreed that Sara Bailey would "talk to" minor R.H., the victim in CR201800252, to encourage her to make statements inconsistent with her prior sworn testimony against Justin Copeland in an effort to obtain a new trial or support an appeal for Justin Copeland, in violation of A.R.S. §§ 13-2802, 13-1003, 13-105, 13-701, 13-702, 13-801, 13-901, a class 5 felony.

COUNT 2

From on or after April 5, 2019 through April 15, 2019, **JUSTIN ALEXANDER COPELAND** and SARA BAILEY (f.k.a. SARA COPELAND) conspired to commit hindering prosecution in the first degree by preventing or obstructing by means of force, deception or intimidation anyone from performing an act that might aid in the discovery, apprehension, prosecution or conviction of the other person, to wit: agreed that Sara Bailey would "talk to" minor R.H., the victim in CR201800252, to encourage her to make statements inconsistent with her prior sworn testimony against Justin Copeland in an effort to obtain a new trial or support an

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1 appeal for Justin Copeland, in violation of A.R.S. §§ 13-2510, 13-2512, 13-1003, 13-105, 13-
2 701, 13-702, 13-801, 13-901, a class 5 felony.

3 **COUNT 3**

4 From on or after April 5, 2019 through April 15, 2019, **JUSTIN ALEXANDER**
5 **COPELAND** and SARA BAILEY (f.k.a. SARA COPELAND) conspired to commit tampering
6 with a witness by knowingly communicating, directly or indirectly, with a witness in any official
7 proceeding to unlawfully withhold testimony or testify falsely, to wit: agreed that Sara Bailey
8 would "talk to" minor R.H., the victim in CR201800252, to encourage her to make statements
inconsistent with her prior sworn testimony against Justin Copeland in an effort to obtain a new
trial or support an appeal for Justin Copeland, in violation of A.R.S. §§ 13-2804, 13-1003, 13-
105, 13-701, 13-702, 13-801, 13-901, a class 6 felony.

9 **COUNT 4**

10 From on or after April 5, 2019 through April 15, 2019, **JUSTIN ALEXANDER**
11 **COPELAND** and SARA BAILEY (f.k.a. SARA COPELAND) aided and abetted one another in
12 influencing a witness by threatening or offering, conferring or agreeing to confer a benefit upon a
13 witness in any official proceeding with the intent to influence the testimony of that person, to
14 wit: Sara Bailey, at the request and direction of Justin Copeland, pressured, coerced or
encouraged her daughter, minor R.H., the victim in CR201800252, to make statements
inconsistent with her prior sworn testimony against Justin Copeland in an effort to obtain a new
trial or support an appeal for Justin Copeland, in violation of A.R.S. §§ 13-2802, 13-303, 13-105,
13-701, 13-702, 13-801, 13-901, a class 5 felony.

15 **COUNT 5**

16 From on or after April 5, 2019 through April 15, 2019, **JUSTIN ALEXANDER**
17 **COPELAND** and SARA BAILEY (f.k.a. SARA COPELAND) aided and abetted one another in
18 hindering prosecution in the first degree by preventing or obstructing by means of force,
19 deception or intimidation anyone from performing an act that might aid in the discovery,
20 apprehension, prosecution or conviction of the other person, to wit: Sara Bailey, at the request
21 and direction of Justin Copeland, pressured, coerced or encouraged her daughter, minor R.H., the
victim in CR201800252, to make statements inconsistent with her prior sworn testimony against
Justin Copeland in an effort to obtain a new trial or support an appeal for Justin Copeland, in
violation of A.R.S. §§ 13-2510, 13-2512, 13-303, 13-105, 13-701, 13-702, 13-801, 13-901, a
class 5 felony.

22 **COUNT 6**

23 From on or after April 5, 2019 through April 15, 2019, **JUSTIN ALEXANDER**
24 **COPELAND** and SARA BAILEY (f.k.a. SARA COPELAND) aided and abetted one another in
25 tampering with a witness by knowingly communicating, directly or indirectly, with a witness in
any official proceeding to unlawfully withhold testimony or testify falsely, to wit: Sara Bailey,
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1 at the request and direction of Justin Copeland, pressured, coerced or encouraged her daughter,
2 minor R.H., the victim in CR201800252, to make statements inconsistent with her prior sworn
3 testimony against Justin Copeland in an effort to obtain a new trial or support an appeal for
Justin Copeland, in violation of A.R.S. §§ 13-2804, 13-303, 13-105, 13-701, 13-702, 13-801, 13-
901, a class 6 felony.

4 DATED this 18th day of April, 2019.

5 COCHISE COUNTY ATTORNEY

True Bell

7 BY:

8 Sara V. Ransom
SARA V. RANSOM
Deputy County Attorney

Jamarc Moore
Foreperson of the Grand Jury

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